

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ULKU ROWE,

Case No. 1:19-cv-08655-JHR

Plaintiff,

v.

GOOGLE LLC,

Defendant.

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**DECLARATION OF SARA B. TOMEZSKO**

I, Sara B. Tomezsko, declare as follows:

1. I am a partner at Paul Hastings LLP (“Paul Hastings”), counsel for Defendant Google LLC (“Google”) in the above-captioned matter.
2. I submit this Declaration in support of Google’s Further Opposition to Plaintiff Ulku Rowe’s Motion for Attorneys’ Fees and Costs. (ECF No. 361.)
3. This Declaration attaches as exhibits excerpts from Outten & Golden LLP’s (“O+G”) time entries submitted as Exhibit 3 to the Declaration of Cara E. Greene. (ECF No. 384-3.) Where only a portion of the time in each entry is relevant to the topic for which it is cited, Paul Hastings has indicated the amount of time at issue in a separate column (highlighted in gray), to the extent O+G’s time entries distinguish time spent on discrete tasks within a single billing entry. Any estimates of time necessitated by block billing or generally-worded time entries have been indicated by an asterisk. These excerpts are not intended to be an exhaustive accounting of O+G’s fees incurred in the post-trial period; rather, they are intended as representative examples only.

**I. ROWE CANNOT RECOVER FOR INEFFICIENT USE OF TIME.**

4. Attached hereto as **Exhibit 1** is an excerpt of O+G’s billing records reflecting approximately 23 hours billed for internal conferences from October 30 through December 14, 2023.

5. Attached hereto as **Exhibit 2** is an excerpt of O+G’s billing records reflecting approximately 9 hours of legal research performed by Partner Gregory Chiarello at \$800/hour and approximately 24 hours of legal research performed by Counsel Moira Heiges-Goepfert at \$650/hour.

6. Attached hereto as **Exhibit 3** is an excerpt of O+G’s billing records reflecting Partner Cara Greene redacting “sample retainer agreements” for nearly one hour at \$950/hour; Mr. Chiarello performing the same clerical task for approximately half an hour at \$800/hour; and a paralegal performing the same clerical task at \$325/hour.

7. Attached hereto as **Exhibit 4** is an excerpt of O+G’s billing records reflecting Associate Amanda Chan billing 3.4 hours on “legal research re[garding] gender discrimination lawsuits against Google,” which this Court twice ruled was irrelevant to Rowe’s claims. (ECF No. 292; Trial Tr. 15:5–24.) One of the four lawsuits referenced in Rowe’s opposition to remittitur of punitive damages is *Haggan et al. v. Google LLC*, (ECF No. 374 at 10), in which plaintiffs and the putative class are represented by O+G.

8. Attached hereto as **Exhibit 5** is an excerpt of O+G’s billing records reflecting paralegals billing approximately 4.5 hours to preparing biographies of O+G’s attorneys to include in Rowe’s Motion for Attorneys’ Fees and Costs. Attached hereto as **Exhibit 6** are the publicly

available biographies of the same attorneys,<sup>1</sup> which are materially identical to the biographies that O+G submitted in its Motion. (See ECF No. 363.)

9. Attached hereto as **Exhibit 7** is an excerpt of O+G's billing records reflecting a paralegal billing approximately 4 hours to preparing the tables of contents and authorities for Rowe's two post-trial moving briefs.

## II. OTHER EXHIBITS

10. Attached hereto as **Exhibit 8** are true and correct copies of excerpts from the trial transcript, dated October 10–20, 2023.

**PURSUANT TO 28 U.S.C. § 1746, I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.**

Dated: January 10, 2024



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Sara B. Tomezsko

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<sup>1</sup> Available at <https://www.outtengolden.com/professionals/attorney/> (last visited on January 10, 2024).